

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

TEMUJIN KENSU,

Plaintiff,

v.

Case No.: 22-cv-11834

DANA NESSEL, individually  
and in her official capacity as Attorney  
General of the State of Michigan,

Defendant.

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**MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS'  
MOTION TO DISMISS**

**NOW COMES** Plaintiff TEMUJIN KENSU, by and through his attorneys, with this Motion for Extension of Time to Respond to Defendants' Motion to Dismiss and hereby states the following:

1. Defendants filed their Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b) on October 6, 2022 (ECF 008).
2. Plaintiff's Response to Defendants' Motion to Dismiss is due on October 27, 2022.
3. Plaintiff's firm has undergone unexpected staffing changes in October 2022. Due to such, Plaintiff is seeking an extension to file their response to Defendants' Motion to Dismiss.

4. Plaintiff respectfully requests a 30-day extension of time to file their Response to Defendants' Motion to Dismiss, making the Response due on or before November 26, 2022.

5. The hearing on Defendants' Motion to Dismiss is set to be heard on November 23, 2022. Plaintiff respectfully requests that the hearing date be adjourned to allow for the full briefing of the present motion with the requested extension.

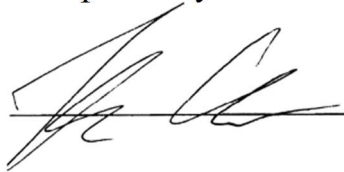
6. Plaintiff has conferred with Defendants on the details of the present Motion. Defendants will not oppose the present Motion.

7. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

**WHEREFORE** Plaintiff requests that the Court approve the foregoing Motion.

Date: October 20, 2022

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Keith Altman', written over a horizontal line.

Keith Altman, Esq.  
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**CERTIFICATE OF SERVICE**

I certify that on October 20, 2022, I served the foregoing Motion for Extension of Time to Respond to Defendants' Motion to Dismiss upon all parties herein by filing copies of same using the ECF System.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Keith Altman', written over a horizontal line.

Keith Altman, Esq.